

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

DECLARATION OF JEFFREY M. GOULD
IN SUPPORT OF PLAINTIFFS' MOTION TO PRECLUDE CERTAIN EXPERT
TESTIMONY BY DR. NICK FEAMSTER

I, Jeffrey M. Gould, hereby declare:

1. I am Senior Counsel Oppenheim + Zbrak, LLP, and am admitted to practice law in the District of Columbia, among other jurisdictions. I am counsel for Plaintiffs in the above-captioned case. I have personal knowledge of all facts stated in this declaration, and if called upon as a witness, I could and would competently testify thereto.

2. I submit this declaration in support of Plaintiffs' Motion to Preclude Certain Expert Testimony by Dr. Nick Feamster filed contemporaneously herewith.

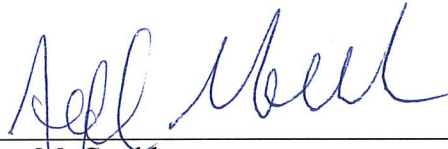
3. Attached hereto are true and correct copies of the following exhibits:

Exhibit	Description
1	Excerpts from the Rebuttal Expert Report of Dr. Nick Feamster, Ph.D., May 15, 2019.
2	Excerpts from the Deposition Transcript of Dr. Nicholas Feamster, Ph.D., May 29, 2019.
3	Declaration of Sam Bahun in Support of Plaintiffs' Motion for Summary Judgment.
4	Excerpts from the Report of George P. McCabe, Ph.D., April 10, 2019

5	Excerpts from Supplemental/Rebuttal Expert Report of Christian Tregillis, May 15, 2019.
6	Excerpts from the Rule 30(b)(6) Deposition Transcript of Vance Ikezoye for Audible Magic, dated May 6, 2019.
7	Evan Engstrom and Nick Feamster, Engine, <i>The Limits of Filtering: A look at the Functionality & Shortcomings of Content Detection Tools</i> (March 2017).
8	Engine, <i>About Engine</i> , https://www.engine.is/about-old (last visited Aug. 26, 2019).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 30, 2019 in Washington, District of Columbia.

A handwritten signature in blue ink, appearing to read "Jeff Gould", is written over a horizontal line.

Jeffrey M. Gould
Counsel for Plaintiffs